



# GMD SHIPYARD CORP.

BROOKLYN NAVY YARD BLDG. #595

63 FLUSHING AVENUE, UNIT #276

BROOKLYN, NY 11205

TEL: (718) 260-9200

FAX: (718) 260-9284

Chief, Water Compliance Branch- Mr. Douglas McKenna  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency – Region 2  
290 Broadway – 20<sup>th</sup> Floor  
New York, New York 10007-1866

13 February 2015

Kimberly McEathron  
DECA – Water Compliance Branch  
U.S. Environmental Protection Agency  
290 Broadway – 20<sup>th</sup> Floor  
New York, NY 10007

Re: GMD Shipyard Administrative Compliance Order CWA-02-2014-3050

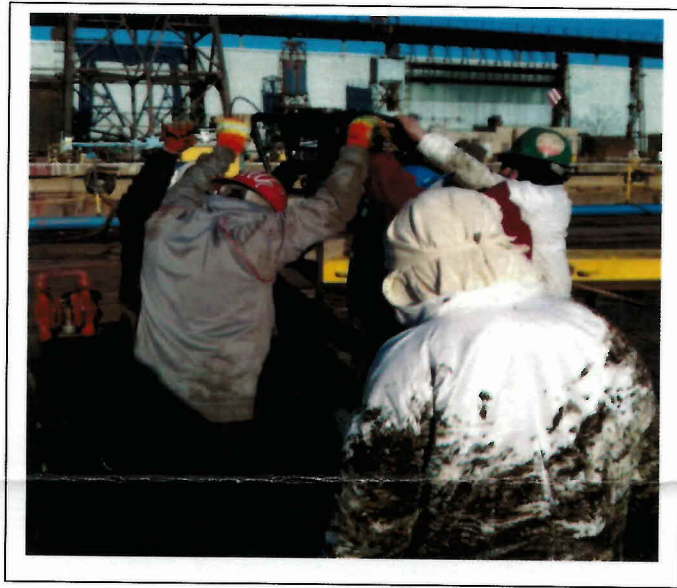
Mr. Douglas McKenna & Ms. Kimberly McEathron,

GMD Shipyard has continued to work to meet the requirements of the subject compliance order. This letter is an update of activities we are taking to control storm water pollution and other work steps taken to meet the compliance order.

In accordance with the subject order and section C. Ordered Provisions 2.ii.a.1,2,4,5, and 6 were previously accomplished. Ordered Provision 2.ii.a.3 continues to be accomplished. To this effort, GMD has removed over 86 dumpster truck loads with roughly 20 to 30 tons each of waste for proper landfill. As soon as the weather allows, we will continue removing this debris.

In accordance with the subject order and section C. Ordered Provisions 2.ii.b. GMD has completed items 1, 2, 3, 4, 5, and 6. As soon as the 'reported' catch basins noted by item 2.ii.b.7 are visible we will take steps to clean them out.

In spite of poor weather conditions GMD has continued cleaning the storm drains. Attached are a few pictures indicating work on the drains and some pictures showing work in the snow conditions.



Men using auger machine to cut through drain mud.



Men handling auger machine after extending the auger down 8 plus feet.



Worker doing final cleaning of drain and inspecting brick drain construction in icy conditions



Men working  
Safely, keeping  
Watch over Worker  
inside drain on  
The west side of  
Graving Dock #6



Different Team working/cleaning other drains, this drain is located at the ESE corner and head of Graving Dock #6

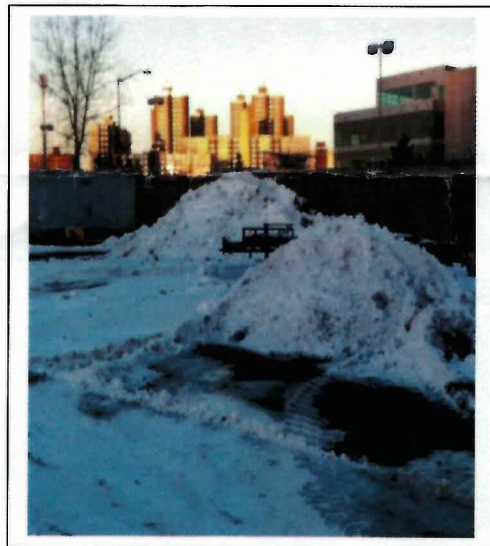


We first chip away the ice and then open and empty the drain. Some drain covers made of cast steel were broke being frozen. Temporary covers of steel sheets are used to replace them until a new drain cover plate can be constructed.

Typical yard cover  
With snow/ice prior  
To melting and  
Working in drains



Yard west side of Graving Dock #6 where all drains have been cleared, now covered with ice and snow.

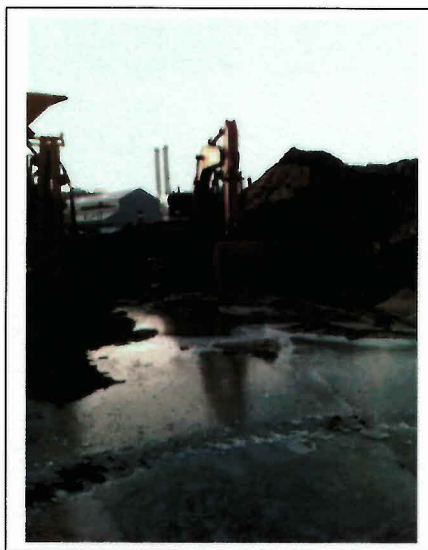
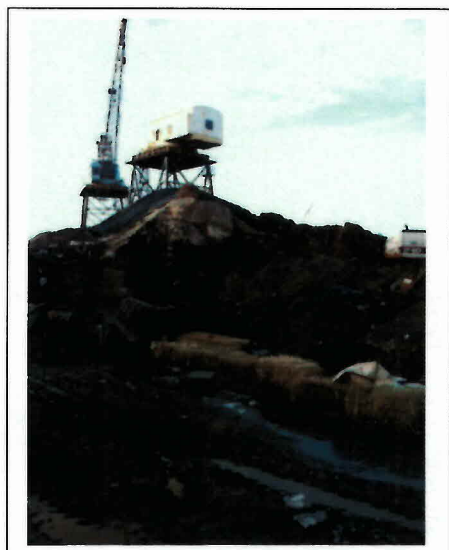


Piles of snow kept on property awaiting melting. Snow is not put into the graving docks or dumped into the surrounding waters.

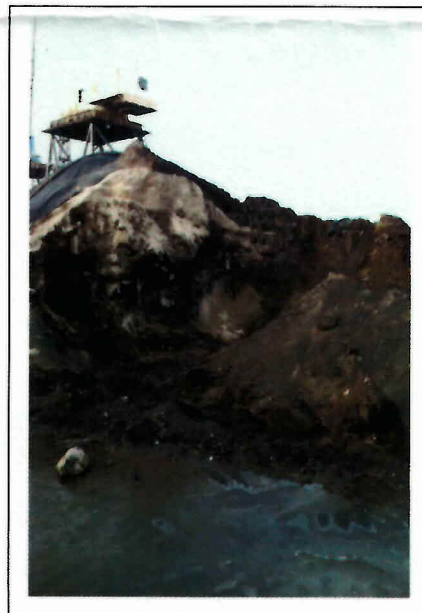
Typical Drain after  
Being emptied with  
Cover put back in  
Position.



Removal of waste from yard pile:



Waste removal continues despite freezing weather. Areas that have been dug out fill with rain and snow water and then freeze.



Should you have any questions concerning this information, please do not hesitate to call me.

Regards,

A handwritten signature in blue ink, reading "Kevin A. Nugent". The signature is fluid and cursive, with the first name "Kevin" and last name "Nugent" clearly legible.

Kevin A. Nugent

HSE Director

[knugent@gmdshipyard.com](mailto:knugent@gmdshipyard.com)

347-675-8876